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Via Electronic Case Filing System

November 30, 2021

Hon. Loretta A. Preska
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Smart Agunbiade, 21 Cr. 609 (LAP)*

Dear Judge Preska:

I write on behalf of my client, Smart Agunbiade, to request a modification to the travel conditions of Mr. Agunbiade's bail. Mr. Agunbiade secured bail and is currently being supervised by the U.S. Pretrial Service Office in the District of Newark, New Jersey. The current conditions of his pretrial release restrict travel to the Southern and Eastern Districts of New York and the District of New Jersey.

Mr. Agunbiade is self-employed and currently runs a business providing rental cars and car parts and services in the surrounding states. We respectfully request a modification to his bail to allow for verified business travel to New York, Connecticut, Pennsylvania, Maryland, Delaware and the District of Columbia upon advance notice to and approval of his Pretrial Services Officer.

I've consulted with the Government and Pretrial Services (in both the District of New Jersey and the Southern District of New York). The Government defers to Pretrial Services, and Pretrial Services does not oppose this request.

I thank the Court for its consideration of this matter.

SO ORDERED


LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

11/30/21

Respectfully submitted,

s/ Arlo Devlin-Brown
Arlo Devlin-Brown